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DOC #:

DATE FILED: 4-26-05

UNITED STATES DISTRICT COURT FOR
THE SOUTHERN DISTRICT OF NEW YORK

**IN RE TERRORIST ATTACKS
ON SEPTEMBER 11, 2001**

03 MDL 1570 (RCC)

*ECP**This document relates to:**Estate of John P. O'Neill, Sr., et al v. Al Baraka Inv. & Dev. Corp., et al, 04-CV-1923
(RCC)**Estate of John P. O'Neill, Sr., et al v. Republic of Iraq, et. al., 04- CV- 1076 (RCC)***STIPULATED EXTENSION OF TIME
TO ANSWER OR OTHERWISE PLEAD****TO THE HONORABLE COURT:**

NOW APPEAR, without submitting to the jurisdiction of this Court, Martin Wachter, Erwin Wachter, Secor Treuhand Anstalt, and Asat Trust Reg, by and through the undersigned counsel, along with the undersigned counsel representing the Plaintiffs in these matters, and respectfully stipulate and agree to, subject to the approval of this Court, as follows:

1. On or about March 14, 2005, Martin Wachter, Erwin Wachter, Secor Treuhand Anstalt, and Asat Trust Reg. ("Stipulating Defendants") each received letters from Gina M. MacNeil, Esq., of the Law Offices of Jerry S. Goldman & Associates, P.C., attorneys for the Plaintiffs in the above-referenced action, sent by the Clerk of the United States District Court for the Southern District of New York, enclosing a copy of the Original Complaint, First Amended Complaint, Second Amended Complaint and Summons in these cases.

2. Assuming *arguendo* that receipt of these letters constituted effective service of process upon these Stipulating Defendants, a responsive pleading would be due on April 4, 2005.

3. Plaintiffs shall serve their RICO Statements concerning the Stipulating Defendants, as required by Paragraph 7 of the Court's Standing Rules of Practice and in Paragraph 14 of Case Management Order No. 2, not later than thirty (30) days from the date the Court approves this Stipulation and Order.

4. Stipulating Defendants shall answer or otherwise plead thirty (30) days from the date of filing of the aforesaid RICO Statements for the Stipulating Defendants

5. Plaintiff shall have forty five (45) days from the filing of such pleading, to respond.

6. Stipulating Defendants shall have thirty (30) days from the receipt of such response to file a reply, if warranted and/or permitted.

RESPECTFULLY SUBMITTED this 4th day of April, 2005.

Coburn & Schertler

Barry Coburn Jr.

Lisa Fishberg (S.D.N.Y. # LF6946)

Barry Coburn (request for admission *pro hac vice* forthcoming)

Alexander Bopp (request for admission *pro hac vice* forthcoming)

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ATTORNEYS FOR MARTIN WACHTER,
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ANSTALT and ASAT TRUST REG.

And

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April 4, 2005

ATTORNEYS FOR PLAINTIFFS

So ordered this 25 day of April, 2005

Hon. Richard C. Casey,
United States District Court Judge